

1 WILL M. YAMADA, ESQ. (SBN 226669)
KATHLEEN N. MASTAGNI, ESQ. (SBN 244298)
2 **MASTAGNI, HOLSTEDT, AMICK,**
MILLER, JOHNSEN & UHRHAMMER
3 *A Professional Corporation*
1912 I Street
4 Sacramento, California 95814
Telephone: (916) 446-4692
5 Facsimile: (916) 447-4614

6 Attorney for Plaintiff,
7 Sugar Workers Union Local No. 1

8 DANIEL NEWLAND, ESQ. (SBN 087965)
JENNIFER SVANFELDT, ESQ. (SBN 233248)
9 **SEYFARTH SHAW**
560 Mission Street, Suite 3100
10 San Francisco, California, 94105
Telephone: (415) 397-2823
11 Facsimile: (415) 397-8549

12 Attorneys for Defendant,
C&H Sugar Company, Inc.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15

16 SUGAR WORKERS UNION LOCAL NO. 1,

17 Plaintiff,

18
19 C & H SUGAR COMPANY, INC

20 Defendant.
21

Case No. 3:07-cv-02738-EMC

**[PROPOSED] STIPULATION AND
ORDER TO DISMISS ENTIRE ACTION
WITHOUT PREJUDICE**

22
23 **STIPULATION**

24 Pursuant to Rule 41(a)(1)(ii) of the Federal Rules of Civil Procedure, Plaintiff Sugar Workers
25 Union Local No. 1 ("Plaintiff") and Defendant C & H Sugar Company, Inc. ("Defendant") by their
26 respective counsel, hereby stipulate that this action be dismissed without prejudice and that each party
27 shall bear its own costs and attorneys' fees.
28

1 Dated: January ____, 2008

**MASTAGNI, HOLSTEDT, AMICK,
MILLER, JOHNSEN & UHRHAMMER**

2
3
4 By: /s/ Will M. Yamada
5 WILL M. YAMADA,
6 KATHLEEN N. MASTAGNI
Attorneys for Plaintiff

7 Dated: January ____, 2008

SEYFARTH SHAW LLP

8
9
10 By: /s/ G. Daniel Newland
11 G. DANIEL NEWLAND,
12 JENNIFER SVANFELDT
Attorneys for Defendant

13
14 **[PROPOSED] ORDER**

15 Based upon the stipulation of the parties and for good cause appearing:

16 **IT IS SO ORDERED.**

17
18
19 Dated: January ____, 2008

By: _____
Hon. Edward M. Chen
United States District Court for the
Northern District of California